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March 21, 2011
(Via Electronic Filing and U.S. Mail)

Lester A. Heltzer, Executive Secretary
National Labor Relations Board
1099 14th St. NW, Ste. 11600
Washington D.C. 20005-3419

**RE: STEPHENS MEDIA, LLC D/B/A *HAWAII TRIBUNE-HERALD*; NLRB CASE
NOS. 37-CA-7043 ET AL; NOTICE AND INVITATION TO FILE BRIEFS**

Dear Secretary Heltzer:

When I received my fax copy of the Notice and Invitation to File Briefs on March 2, 2011, it communicated to me there were two issues in which the Board was interested:

1. Whether the witness statement obtained in the *Hawaii Tribune-Herald* case in fact is a witness statement under the *Fleming* and *Anheuser-Busch* cases.
2. If the statement is not classified as a witness statement, is it nevertheless attorney work product?

When one goes to the NLRB's website, your announcement of the invitation contains an issue not present in the invitation itself:

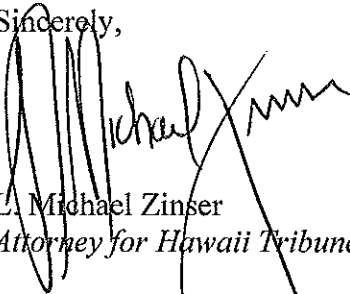
Whether the Board should continue to adhere to the holding *Anheuser-Busch, Inc.* 237 NLRB 982 (1978), that an employer's duty to furnish information under Section 8(a)(5) of the Act does not encompass the duty to furnish witness statements.

If I had not viewed the website, I would not have been aware that that was an issue. There may be other interested parties who have not seen the website announcement. There seems to be some confusion. Is the issue articulated on the website an error?

On behalf of *Hawaii Tribune-Herald*, we are asking the National Labor Relations Board to clarify the issues on which it seeks briefs and to reissue the invitation with extended time limits, in order to more fairly allow interested parties to brief the issues the Board desires to be briefed. We request that the April 1, 2011 date be extended to April 15 and that the parties' reply date be extended to April 29, 2011.

Thank you for your consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Zinser", with a large, loopy flourish extending from the end.

L. Michael Zinser
Attorney for Hawaii Tribune-Herald

LMZ/ss

cc: Joe Frankl, Regional Director, NLRB Region 20 (Via E-mail
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